

## **REMARKS**

Claims 1-3, 5-9, and 11-14 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Bellon (U.S. Patent No. 6,775,686), and further in view of Devarakonda (U.S. Patent No. 5,454,108) or Hurvig (U.S. Patent No. 5,978,802). In response, Applicant amended independent claims 1 and 7 to further clarify that the file management table stores the areas of disk space that are currently in use on a file-by-file basis, and respectfully traverses the rejection. Claims 5 and 11 are amended to clarify that the first area is only written by one file system and the second area is only written by another file system. Applicants traverse the rejection of claims 5 and 11 based on these amendments.

The Examiner correctly acknowledges that Bellon fails to disclose or suggest a file management table. However, the Examiner asserts that Devarakonda or Hurvig teaches a management table in combination with the other features of the present application. Although Devarakonda and Hurvig disclose a management table, these references fail to disclose setting and resetting a flag in the management table when sending and receiving a file, as in the present invention.

More specifically, Bellon, Devarakonda and Hurvig fail to disclose or suggest that in order to transfer in file units, first and second data management units set an indication to show that a file is in use in the file management table before reading or writing the file in the data area. The cited references also fail to disclose or suggest

resetting the in use indication in the file management table after reading or writing the file in the data area to perform exclusive control in file units, as in the present invention.

Nevertheless, in order to expedite prosecution, Applicant has amended independent claims 1 and 11 to further distinguish over the cited prior art by clarifying that the file management table stores the areas of disk space that are currently in use on a file-by-file basis. Claims 5 and 7 are rewritten into independent form and further clarify that the first area is only written by one file system and read by another file system, whereas the second area is only written by the another file system and read by the one file system. Support for these amendments can be found in Applicants' specification on page 9, line 26 et seq.

FIGs. 6B of Devarakonda shows a file management table to store file access information, and an indication of its access status. The figure further shows nodes that store information, such as token ID, mode, and lock. However, Devarakonda fails to disclose or suggest the features recited in the claims, and in particular, a file management table storing the areas of disk space that are currently in use on a file-by-file basis. Devarakonda merely has local lock managers (LOM) storing areas of disk space that are currently in use, but does not teach storing on a file-by-file basis.

Hurvig has a table 220 that lists a file name, process number, and an authorization. However, Hurvig fails to disclose or suggest that the table 220 stores areas of disk space that are currently in use on a file-by-file basis. For these reasons,

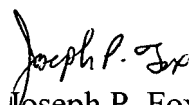
withdrawal of the §103(a) rejection of independent claims 1 and 7 and their dependent claims is respectfully requested.

With respect to independent claims 5 and 11, Bellon has storage elements 100 that have information written to them from storage element controller 110 or storage element controller 120. However, Bellon fails to disclose or suggest limiting writing to the storage elements 100 in certain areas and to certain file systems of a plurality of file systems. More specifically, Bellon does not teach the first area which is only written by one file system and read by another file system of a plurality of file systems, and a second area which is only written by the another file system and read by the one file system. The other cited references also fail to disclose or suggest this feature. For these reasons, withdrawal of the §103(a) rejection of claims 5 and 11 is respectfully requested.

For all of the foregoing reasons, Applicant submits that this Application is in condition for allowance, which is respectfully requested. The Examiner is invited to contact the undersigned attorney if an interview would expedite prosecution.

Respectfully submitted,

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